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Attorneys for Plaintiffs and the Putative Classes and Collective

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

HAROLD JONES, et al.,

Plaintiffs,

vs.

CERTIFIEDSAFETY, INC.

Defendants.

Lead Case No. 3:17-cv-02229-EMC

Consolidated with 3:17-cv-03892-EMC (*Crummie*)

Related to: 3:18-cv-04379-EMC (Ross)

3:19-cv-01338-EMC (Jones II)

3:19-cv-01380-EMC (Jones III)

3:19-cv-01381-EMC (Jones IV)

3:19-cv-01427-EMC (East)

3:19-cv-01428-EMC (Jones V)

**DECLARATION OF EDWIN AIWAZIAN IN
 SUPPORT OF PLAINTIFFS' MOTION FOR
 FINAL APPROVAL OF CLASS AND
 COLLECTIVE ACTION SETTLEMENT,
 ATTORNEYS' FEES, COSTS, AND
 ENHANCEMENT PAYMENTS**

Date: May 28, 2020

Time: 1:30 p.m.

Courtroom: 5 (17th Floor)

Judge: Honorable Edward M. Chen

Jones Complaint Filed: April 21, 2017

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Attorneys for Plaintiffs and the Putative Classes and Collective

DECLARATION OF EDWIN AIWAZIAN

I, Edwin Aiwazian, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiffs. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On January 22, 2020, in Courtroom 5 of the above-entitled Court, the Honorable Edward M. Chen preliminarily approved the Stipulation of Class, Collective, and Representative Action Settlement and Amendment to Stipulation of Class, Collective, and Representative Action Settlement (together, “Settlement” or “Settlement Agreement”), and conditionally certified the proposed Class for settlement purposes. The Court preliminarily appointed and designated Schneider Wallace Cottrell Konecky Wotkyns LLP as counsel for the Classes and Collective. The Court also preliminarily appointed Plaintiffs Harold Jones, Tierre Crummie, Marcellous Ross, and Michael East as the Class Representatives for the California Class, Plaintiffs Jones and Genea Knight as Class Representatives for the Washington Class and Collective, Plaintiff Jones as Class Representative for the Minnesota Class, Plaintiff Jones as Class Representative for the Illinois Class, Plaintiff Sandra Turner as Class Representative for the Ohio Class, and Plaintiff George Azevedo, Jr. as Class Representative for the Alaska Class. The Court preliminarily approved the Notices of Settlement (“Class Notices”) and Text Message Notice to be sent to members of the Classes, and the notice, opt-out, and objection procedures. The Court appointed Heffler Claims Group (“Heffler”) to serve as the Settlement Administrator for handling the notice and settlement administration process.

WORK PERFORMED BY COUNSEL FOR THE PLAINTIFFS AND CLASS

3. I have been actively engaged in this litigation since the action entitled *Tierre Crummie v. CertifiedSafety Inc.*, United States District Court for the Northern District of California Case No. 3:17-cv-03892 (the “*Crummie* Action”) was commenced on April 24, 2017 in the Superior Court of California for the County of Alameda, as have several other members of

Lawyers for Justice, PC. Lawyers for Justice, PC has actively participated in all phases of the litigation process. The ongoing work has been extensive, demanding, and ultimately successful in achieving a substantial settlement resolution and bringing about significant changes to Defendant CertifiedSafety, Inc.'s ("Defendant" or "CertifiedSafety") wage-and-hour policies and practices. Before commencing the *Crummie* Action, Lawyers for Justice, PC investigated and researched the facts and circumstances underlying the pertinent issues and applicable law. This required thorough discussions and interviews with Plaintiff Crummie and other Class Members, and research into the various legal issues in this matter, namely, the current state of the law as it applied to certification, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiff Crummie's claims, and potential defenses. Lawyers for Justice, PC also engaged in significant factual investigation into Defendant's operations and business practices. Based on these investigations, Lawyers for Justice, PC determined that Plaintiff Crummie's claims were well-suited for class treatment owing to what appeared to be a common course of conduct affecting a similarly situated group of employees of Defendant within the State of California, who were not properly compensated for, *inter alia*, all hours worked and non-compliant meal and rest periods.

4. We have worked closely with co-counsel to reach a resolution of the matter. Together with our co-counsel Schneider Wallace Cottrell Konecky Wotkins LLP, we used the pre-settlement time period to investigate the veracity, strength, and scope of the claims, and also to prepare the matter for class certification and trial. This matter has involved extensive investigations, research into legal and factual issues, and formal and informal discovery and exchange of documents and data. Counsel for Plaintiffs propounded multiple sets of discovery requests, served deposition notices for Defendant's Person Most Knowledgeable designees, prepared for and took the deposition of Defendant's Person Most Knowledgeable witness Steve Hines on January 10, 2018 regarding Defendant's organizational structure, wage-and-hour policies, practices, and procedures, among other topics, prepared for and defended the depositions of Plaintiffs Jones and Knight on January 15, 2018 and Plaintiff Crummie on January 15, 2018, interviewed and obtained information from Plaintiffs and other putative class members

(including, and not limited to, the names of potential witnesses), reviewed and analyzed thousands of pages of data and documents produced by Defendant and obtained through other sources, researched applicable law, and undertook damages and valuation analyses and calculations. The documents and data that were reviewed and analyzed by the parties included, and were not limited to, employment records of Plaintiffs and Class Members (including timesheets and earnings statements); acknowledgments; meal period waiver forms; and Defendant's and employment policies (including California Meal and Rest Process Policy and Travel Reimbursement policy), practices, and procedures, among other things. Counsel for Plaintiffs met and conferred with Defendant's counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, jurisdiction, case management, discovery, and production of various documents and data prior to the mediations. Other work performed by counsel for Plaintiffs included, and was not limited to, case strategy and analysis; drafting, reviewing, and revising the pleadings; preparing for and appearing for court proceedings; and preparing for and attending two (2) mediations and settlement negotiations.

5. As outlined herein, the parties have conducted significant investigation, discovery, and exchange of data and documents during the course of this litigation. Counsel for Plaintiffs analyzed a volume of documents and data either produced by Plaintiffs and Defendant or obtained through other sources. These documents and data provided a critical understanding of the nature of the work performed by members of the Classes, as well as Defendant's operations and employment policies, practices, and procedures, and were used in analyzing liability, damages, and valuation issues in connection with all phases of the litigation, and ultimately with the settlement negotiation process. Counsel for the parties have further invested time researching applicable law, which is constantly evolving as it relates to certification, Fair Labor Standards Act ("FLSA") claims, representative PAGA claims, off-the-clock theory, meal and rest periods, wage-and-hour enforcement, Plaintiffs' claims, and Defendant's defenses, as well as facts and evidence produced and analyzed.

6. The work with our co-counsel has been a coordinated and combined effort. Areas of responsibility were divided between the firms so as to avoid unnecessary duplication of work

1 and effort. When the abilities of experienced and skilled co-counsel were needed, however, the
 2 firms worked together. For example, interviewing putative class members and reviewing and
 3 analyzing a large volume of documents and data produced by Defendant involved group effort.
 4 Both firms worked together to strategize the matter and were actively involved in case
 5 investigation, preparing the matter for the mediations and settlement negotiations.

6 7. After conducting significant investigation of the facts and law, counsel for the
 7 parties engaged in extensive settlement negotiations to try to resolve the entire matter. These
 8 efforts included participating in two (2) mediations, the first mediation on January 23, 2018 with
 9 Jeff Ross, Esq. and the second mediation on April 23, 2019, with Paul Grossman, Esq., both of
 10 whom are well-respected mediators who are highly-experienced in mediating complex wage-
 11 and-hour matters. During all settlement discussions, the parties conducted their negotiations at
 12 arm's length in an adversarial position. Prior to and during the mediations, the parties exchanged
 13 information and discussed various aspects of the cases, including and not limited to, the risks and
 14 delays of further litigation, proceeding with certification, as well as the law relating to off-the-
 15 clock theory, meal and rest periods, representative PAGA claims, FLSA claims, and wage-and-
 16 hour enforcement, the evidence produced and analyzed, and the possibility of appeals, among
 17 other things. Arriving at a settlement that was acceptable to the parties was not easy. Defendant
 18 contended that individualized questions of fact predominate over any common issues, and these
 19 issues would pose challenges to certification and representative adjudication. Defendant and its
 20 counsel felt very strongly about Defendant's ability to prevail on the merits and to obtain a denial
 21 of class certification, while Plaintiffs and Plaintiffs' counsel believed that class certification
 22 would be obtained, and that they would prevail at trial. With the aid of the mediators'
 23 evaluations, the parties agreed that this case was well-suited for settlement given the legal issues
 24 relating to the principal claims, as well as the costs and risks to the parties that would attend
 25 further litigation. These risks of further litigation include, and are not limited to, a determination
 26 that the claims are unsuitable for class and collective action treatment and/or representative
 27 adjudication, failure to obtain certification, and de-certification after certification of a class,
 28 allowing a jury to decide the claims asserted in the case, and the real possibility of no recovery

1 after years of litigation.

2 8. Class Counsel seeks attorneys' fees in the amount of \$2,100,000, which is thirty-
 3 five percent (35%) of the Gross Settlement Amount of \$6,000,000, as set forth in the Settlement
 4 Agreement and the notices. This amount is commensurate with: (1) the risk that Plaintiffs'
 5 Counsel took in commencing the cases; (2) the time, effort, and expense dedicated to the matter;
 6 (3) the skill and determination that Plaintiffs' Counsel have shown; (4) the results that Plaintiffs'
 7 Counsel have achieved throughout the litigation; (5) the value of the settlement that Plaintiffs'
 8 Counsel have achieved for the members of the Classes; and (6) the other cases that Plaintiffs'
 9 Counsel have turned down in order to devote their time and efforts to this matter. In addition to
 10 the substantial recovery obtained on behalf of members of the Classes and Collective, Plaintiffs'
 11 Counsel's efforts have also resulted in significant changes to Defendant's wage-and-hour
 12 policies, practices, and procedures.

13 9. Other federal courts have awarded attorneys' fees of at least thirty-five percent
 14 (35%) of the settlement amount to Lawyers for Justice, PC. See *Andrew Dawson, et al. v.*
 15 *HITCO Carbon Composites, Inc.* (C.D. Cal. Nov. 19, 2019) 2:16-cv-07337-PSG-FFM; *Aaron*
 16 *Feao, et al. v. UFP Riverside, LLC* (C.D. Cal. Oct. 22, 2019) 2:17-cv-03080-PSG-JPR; and
 17 *Derrick Byrd, et al. v. Masonite Corporation* (C.D. Cal. March 22, 2018) 5:16-cv-00035-
 18 JGBKK.

19 10. While not necessarily required to be demonstrated because the percentage fee that
 20 is sought in this matter is proper, counsel for Plaintiffs have incurred so many hours of work in
 21 connection with prosecuting this matter that the attorneys' fees request is also justified under a
 22 lodestar analysis. Lawyers for Justice, PC has spent a total of **690.10 hours** performing tasks in
 23 this matter. The hours attributable to Lawyers for Justice, PC include work done by myself and
 24 several other attorneys. We also had litigation support personnel actively engaged in assisting
 25 with the prosecution of this matter. The following hourly rates of compensation are
 26 commensurate with the individual background, training, and experience of the attorneys that are
 27 listed below, who worked on this matter, as well as our firm, in litigation of class actions and
 28 complex wage-and-hour matters.

Attorney	Title	Cal. Bar No.	Admit Year	Hourly Rate	Total Hours	Lodestar
Edwin Aiwarzian	Attorney	232943	2004	\$975	247.80	\$241,605
Arby Aiwarzian	Attorney	269827	2010	\$850	179	\$152,150
Jill J. Parker	Attorney	274230	2010	\$800	132.80	\$106,240
Joanna Ghosh	Attorney	272479	2010	\$800	3	\$2,400
Stephen Hoffman	Attorney	287075	2012	\$600	19	\$11,400
Elizabeth Parker-Fawley	Attorney	301592	2014	\$675	30.25	\$20,418.75
Stephanie S. Ponek	Attorney	306205	2015	\$675	9.75	\$6,581.25
Tiffany J. Hyun	Attorney	314706	2016	\$600	21.5	\$12,900
Kristina Noel Buan	Attorney	311661	2016	\$550	9.5	\$5,225
Danielle L. Chang	Attorney	313881	2017	\$550	1	\$550
Tara Zabehe	Attorney	314706	2017	\$550	15.5	\$8,525
Vanessa Rodriguez	Attorney	316382	2017	\$500	7.75	\$3,875
Angelika Hakopian	Attorney	318655	2017	\$500	13	\$6,500
Margaux V. Roussel	Attorney	323398	2018	\$500	0.25	\$125
				Total:	690.10	\$578,495

11. The work performed in this particular matter, the background of our firm, as well as the individual backgrounds, training, and experience of the attorneys who worked on this matter, in litigating complex wage-and-hour class and representative actions, support a reasonable blended hourly rate of compensation at the rate of at least \$840 for work performed by Lawyers for Justice, PC. Lawyers for Justice, PC has been awarded attorneys' fees, compensating the firm at the rate of at least \$840 per hour for legal services performed, by courts granting final approval in other cases: final approval of the class and representative action settlement in *Jamila Sherman, et al. v. Stitchfix, Inc.* (San Mateo County Superior Court Case No. 18CIV05049) was granted on February 4, 2020; final approval of the class action settlement in *Juan Contreras, et al. v. J.R. Simplot Company* (Sacramento County Superior Court Case No. 34-2017-00205711-CU-OE-GDS) was granted on June 28, 2019; final approval of the class and representative action settlement in *Seth Swan v. Pace Supply* (Sonoma County Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of attorneys' fees involved a higher hourly rate of \$855.96; final approval of the class and representative action settlement in *Eliazar Gonzalez, et al. v. The Wine Group* (Alameda County Superior Court Case No. RG15781726) was granted on October 30, 2018; and final approval of the class and

representative action settlement in *Demetrius Camarillo v. Blue Diamond Growers* (Sacramento County Superior Court Case No. 34-2015-00175871) was granted on June 30, 2017, and the award of attorneys' fees involved a higher hourly rate of \$845.64.

ADEQUACY OF LAWYERS *for* JUSTICE, PC

EDUCATION

12. In May of 2004, I graduated from *Pepperdine University School of Law* with a Juris Doctor degree. I have extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, I have previously served as a *pro bono* mediator for the Los Angeles County Superior Court. In October of 2000, I obtained a Litigation Paralegal Certificate from the *UCLA Extension Program*. During the summer of 2000, I studied Legal Writing at *Harvard University*. In April of 1999, I obtained a Bachelor of Arts degree in Communication with a concentration in Natural Sciences from *Pepperdine University*.

JUDICIAL EXTERNSHIPS

13. From approximately September 2002 to approximately December 2002, I served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the *United States Court of Appeals for the Ninth Circuit*. From approximately June 2002 to approximately August 2002, I served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the *California Court of Appeal for the Second Appellate District*.

LITIGATION AND CLASS ACTION EXPERIENCE

14. In December of 2004, I obtained a license to practice law from the California State Bar. From approximately December 2004 to approximately August 2008, I was employed by *Girardi & Keese*.

15. At *Girardi & Keese*, my practice focused on class actions and other complex cases involving toxic torts and products liability. In addition, I gained substantial experience on cases involving insurance bad faith, premises liability, and medical negligence. While employed by *Girardi & Keese*, I argued approximately 100 motions, took or defended approximately 150 depositions, and prepared dozens of expert witnesses for deposition or trial.

16. Since its inception, in or around October of 2008, our firm has almost exclusively focused on the prosecution of consumer and employment class actions, involving wage-and-hour claims, race discrimination, unfair business practices or consumer fraud. Currently, we are the attorneys of record in over a dozen employment-related putative class actions in both state and federal courts in the State of California. Our firm has successfully litigated cases involving the executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements. During this relatively short time, in association with other law firms, we have recovered millions of dollars on behalf of thousands of individuals in California.

EXAMPLES OF CLASS ACTION RESULTS

17. What follows are just a few examples of the type of results we have achieved on behalf of our clients:

a) Our firm represented the plaintiffs in a wage-and-hour class and representative action against a major property management company involving allegations of misclassification of various “manager” positions. On September 20, 2010, the court granted final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is BC400414.

b) Our firm represented the plaintiffs in a wage-and-hour class action against a national retailer of household items involving allegations of misclassification of the “Assistant Store Manager” position. On October 28, 2010, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC413498.

c) Our firm represented the plaintiffs in a wage-and-hour class action against a national property management company involving allegations of misclassification of the “Property Manager” position. On May 23, 2012, the court granted final approval of the class action settlement. The Los Angeles County Superior Court Case Number is BC430918.

d) Our firm represented the plaintiffs in a wage-and-hour class action involving allegations of misclassification of the “Store Manager” position. On June 10, 2011, the court granted plaintiffs’ motion for class certification. On August 26, 2013, the court granted

1 final approval of the class action settlement. The Los Angeles County Superior Court Case
 2 Number is BC424012.

3 e) Our firm represented the plaintiffs in a wage-and-hour class and
 4 representative action against a bank, involving allegations of misclassification of the “Assistant
 5 Branch Manager” position. On August 27, 2013, the court granted final approval of the class
 6 and representative action settlement. The Kern County Superior Court Case Number is S-1500-
 7 CV-273194-LHB.

8 f) Our firm represented the plaintiffs in a wage-and-hour class and
 9 representative action against a national wholesale distributor of plumbing and builder supplies,
 10 involving allegations of misclassification of multiple salaried “manager” positions. On May 22,
 11 2014, the court granted final approval of the class and representative action settlement. The
 12 Sacramento County Superior Court Case Number is 34-2012-00136285.

13 g) Our firm represented the plaintiff in a wage-and-hour class action
 14 involving allegations of misclassification of the “Operations Manager” position. On September
 15 16, 2014, the court granted plaintiff’s motion for class certification. The Los Angeles County
 16 Superior Court Case Number is BC478769.

17 h) Our firm represented the plaintiff in a wage-and-hour class and
 18 representative action against a national retailer of household items, on behalf of hourly-paid or
 19 non-exempt employees. On May 27, 2015, the court granted final approval of the class and
 20 representative action settlement. The San Francisco County Superior Court Case Number is
 21 CGC-13-532344.

22 i) Our firm represented the plaintiff in a wage-and-hour class action
 23 involving allegations of misclassification of the salaried residential “Property Manager” position.
 24 On September 17, 2015, the court granted plaintiff’s motion for class certification. The Los
 25 Angeles County Superior Court Case Number is BC474784.

26 j) Our firm, in association with other co-counsel, represented the plaintiffs in
 27 a wage-and-hour class and representative action against a national retailer of upscale hardware
 28 and home furnishings, on behalf of non-exempt employees. On April 28, 2016, the court granted

1 final approval of the class and representative action settlement. The Los Angeles County
 2 Superior Court Case Number is JCCP4794.

3 k) Our firm, in association with other co-counsel, represented the plaintiffs in
 4 a wage-and-hour class and representative action against a national retailer of apparel and fashion
 5 accessories, on behalf of non-exempt employees. On August 5, 2016, the court granted final
 6 approval of the class and representative action settlement. The Los Angeles County Superior
 7 Court Case Number is BC488069.

8 l) Our firm, in association with other co-counsel, represented the plaintiffs in
 9 a wage-and-hour class action against a national retailer of apparel, accessories, and home
 10 products, involving allegations of misclassification of the "Department Manager" position. On
 11 August 12, 2016, the court granted the plaintiffs' motion for class certification in part and
 12 certified a class. The Alameda County Superior Court Case Number is RG13680477.

13 m) Our firm represented the plaintiff in a representative action under the
 14 Private Attorneys General Act, against a real estate and property management company, on
 15 behalf of non-exempt employees. On November 4, 2016, the court granted approval of the
 16 PAGA settlement. The Orange County Superior Court Case Number is 30-2015-00775439-CU-
 17 OE-CXC.

18 n) Our firm, in association with other co-counsel, represented the plaintiffs in
 19 a wage-and-hour class and representative action against a full-service bank, on behalf of non-
 20 exempt employees. On November 18, 2016, the court granted final approval of the class and
 21 representative action settlement. The San Francisco County Superior Court Case Number is CJC-
 22 13-004839.

23 o) Our firm represented the plaintiffs in a wage-and-hour class and
 24 representative action against a foodservice distributor, on behalf of non-exempt employees. On
 25 January 26, 2017, the court granted final approval of the class and representative action
 26 settlement. The San Bernardino County Superior Court Case Number is CIVDS1507260.

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1 p) Our firm, on behalf of the plaintiff and respondent in a PAGA
2 representative action, successfully opposed in the trial court, and briefed and argued an appeal
3 with respect to the employer's motion to compel arbitration, which resulted in a published
4 opinion by the California Court of Appeal in favor of employees. *Roberto Betancourt v.*
5 *Prudential Overall Supply*, 9 Cal.App.5th 439 (Cal. App. 4th Dist., Mar. 7, 2017), review denied,
6 cert. denied (U.S. Supreme Court Docket No. 17-254).

7 q) Our firm, in association with other co-counsel, represented the plaintiffs in
8 a wage-and-hour class and representative action against a manufacturer of food service industry
9 supplies on behalf of non-exempt employees. On April 14, 2017, the court granted final approval
10 of the class and representative action settlement. The Orange County Superior Court Case
11 Number is 30-2015-00810013-CU-OE-CXC.

12 r) Our firm represented the plaintiff in a wage-and-hour class and
13 representative action against a property management company, on behalf of non-exempt
14 employees. On June 14, 2017, the court granted final approval of the class and representative
15 action settlement. The Los Angeles County Superior Court Case Number is BC586234.

16 s) Our firm represented the plaintiff in a wage-and-hour class and
17 representative action against a food company on behalf of non-exempt employees. On June 30,
18 2017, the court granted final approval of the class and representative action settlement. The
19 Sacramento County Superior Court Case Number is 34-2015-00175871.

20 t) Our firm represented the plaintiffs in a wage-and-hour class and
21 representative action against a chocolate company on behalf of non-exempt employees. On July
22 19, 2017, the court granted final approval of a class and representative action settlement. The
23 Alameda County Superior Court Case Number is RG15764300.

24 u) Our firm represented the plaintiffs in a wage-and-hour class and
25 representative action against a manufacturer of plastic containers on behalf of non-exempt
26 employees. On October 31, 2017, the court granted final approval of the class and representative
27 action settlement. The Los Angeles County Superior Court Case Number is BC577233.
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v) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class and representative action against a bank on behalf of non-exempt employees. On December 11, 2017, the court entered an order granting final approval of class and representative action settlement. The Los Angeles County Superior Court Case Number is BC569646.

w) Our firm, in association with co-counsel, represented the plaintiffs in a wage-and-hour class and representative action against a property management company on behalf of hourly-paid and non-exempt employees. On January 4, 2018, the court entered an order granting final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is JCCP4819.

x) Our firm, in association with other co-counsel, represented the plaintiffs in a wage-and-hour class and representative action against a company that operates business centers. On February 15, 2018, the court granted final approval of the class and representative action settlement. The Los Angeles County Superior Court Case Number is BC498401.

y) Our firm, in association with other co-counsel, represented the plaintiff in a representative action under the Private Attorneys General Act, against a global provider of products and services to the energy industry, on behalf of hourly-paid and non-exempt employees. On November 19, 2018, the Court granted approval of the settlement. The Kern County Superior Court Case Number is S-1500-CV-280215-SDC.

z) Our firm represented the plaintiff in a wage-and-hour class action against a parking company on behalf of non-exempt employees. On September 3, 2019, the court granted the plaintiff's motion for class certification and certified a class. The Santa Clara County Superior Court Case Number is 16CV292208 and the Judicial Council Coordination Proceeding Number is JCCP 4886.

aa) Our firm, in association with other counsel, on behalf of the plaintiff and respondent in a PAGA representative action, successfully opposed in the trial court, and briefed and argued an appeal with respect to the employer's motion to compel arbitration, resulting in a notable decision from the California Supreme Court clarifying the law and finding, in part, that

1 employer arbitration agreements are unenforceable where they block a PAGA claim from
2 proceeding, *ZB, N.A. v. Superior Court*, 8 Cal.5th175 (2019).

3 bb) Our firm represented the plaintiffs in a wage-and-hour class and
4 representative action against a bank on behalf of non-exempt employees. On September 27,
5 2019, the court granted the plaintiffs' motion for class certification in part and certified a class.
6 The Alameda County Superior Court Case Number is_RG15757606 and the Judicial Council
7 Coordination Proceeding Number is JCCP 4921.

8 cc) Our firm represented the plaintiffs in a wage-and-hour class and
9 representative action against a national retailer of apparel and fashion accessories, on behalf of
10 non-exempt employees. On October 9, 2019, the court granted the plaintiffs' motion for class
11 certification in part and certified a class. The Sacramento County Superior Court Case Number
12 is 34-2015-00175330-CU-OE-GDS.

13 dd) Our firm represented the plaintiff in a wage-and-hour class and
14 representative action against a medical equipment supplier on behalf of non-exempt employees.
15 On February 13, 2020, the court granted the plaintiff's motion for class certification and certified
16 a class. The San Bernardino County Superior Court Case Number is CIVDS1505744.

17 ee) Our firm, in association with other counsel, represented the plaintiff in a
18 wage-and-hour class and PAGA representative action against a large national drug testing
19 laboratory on behalf of non-exempt employees. On February 21, 2020, the court granted the
20 plaintiff's motion for class certification and certified a class. The San Diego County Superior
21 Court Case Number is 37-2018-00019611-CU-OE-CTL.

22 ff) Our firm represented the plaintiffs in a wage-and-hour class and
23 representative action against a national retailer of sportswear, footwear, and camping equipment
24 on behalf of non-exempt employees. On March 16, 2020, the court granted in part the plaintiff's
25 motion for class certification and certified a class. The Riverside County Superior Court Case
26 Number is RICJCCP4930.

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LITIGATION COSTS AND EXPENSES INCURRED BY PLAINTIFFS' COUNSEL

18. To date, counsel for Plaintiffs have borne all the risks and costs of litigation and will not receive any compensation until recovery is obtained by Plaintiffs and the members of the Classes and Collective. Lawyers for Justice, PC has incurred **\$12,498.41** in litigation costs and expenses as reflected in "**EXHIBIT A**" attached hereto.

ENHANCEMENT PAYMENTS TO PLAINTIFFS

19. In recognition of their efforts and work serving as the Class Representatives, the Settlement provides for enhancement payments in the amount of \$15,000 each to Plaintiffs Jones, Knight, and Crummie, \$10,000 each to Plaintiffs Ross and East, and \$5,000 each to Plaintiffs Azevedo and Turner. The requested enhancement payments are fair and appropriate. Plaintiffs spent a substantial amount of time and effort in producing relevant documents and past employment records and provided the facts and evidence necessary to attempt to prove the allegations, including and not limited to, with respect to Plaintiffs Jones, Knight and Crummie, by way of preparing for and attending a depositions. Plaintiffs were available whenever their attorneys needed them and actively tried to obtain, and gave, information that would benefit the members of the Classes and the Collective. Plaintiffs spent numerous hours speaking with their attorneys about their claims, describing their work experiences with Defendant, and gathering and reviewing documents. Accordingly, it is appropriate for Plaintiffs to each receive reasonable enhancement payments, in addition to their settlement payments, for their services on behalf of the members of the Classes and Collective.

20. I submit that the Settlement is fair, reasonable, and adequate. In addition, the Settlement is in the best interests of the Plaintiffs and the Classes.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 17th day of April 2020, at Glendale, California.

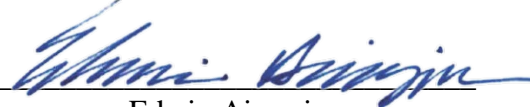

Edwin Aiwasian

EXHIBIT A

LAWYERS for JUSTICE PC CASE COST DETAIL
Crummie v. CertifiedSafety, Inc.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
12/15/16	U.S. Postmaster	Postage	6.47
3/16/17	U.S. Postmaster	Postage	6.80
4/21/17	Labor & Workforce Development Agency	Filing Fee	75.00
4/24/17	ProLegal	Attorney Service	333.45
4/24/17	Alameda Superior Court	Filing Fee	435.00
4/24/17	Alameda Superior Court	Complex Fee	1,000.00
6/9/17	ProLegal	Attorney Service	226.36
6/16/17	CourtCall, LLC	Attorney Service	86.00
6/21/17	ProLegal	Attorney Service	114.95
6/26/17	ProLegal	Attorney Service	124.70
7/6/17	Golden State Overnight	Courier Service	11.32
7/6/17	FedEx Express	Courier Service	29.61
7/7/17	ProLegal	Attorney Service	159.95
7/10/17	Alameda Superior Court	Document Download Fee	8.50
7/19/17	Golden State Overnight	Courier Service	23.22
7/28/17	Golden State Overnight	Courier Service	25.97
8/9/17	Golden State Overnight	Courier Service	17.72
8/17/17	Golden State Overnight	Courier Service	17.37
9/21/17	Jill Parker	Travel Reimbursement	716.50
10/4/17	U.S. Postmaster	Postage	14.40
10/5/17	Golden State Overnight	Courier Service	26.63
10/16/17	CourtCall, LLC	Attorney Service	30.00
11/3/17	Alameda Superior Court	Document Download Fee	1.00
11/6/17	ProLegal	Attorney Service	159.95
1/11/18	Document Technologies, LLC	Court Reporter	630.30
1/11/18	Tierre Crummie	Travel Reimbursement	1,216.14
1/11/18	Arby Aiwazian	Travel Reimbursement	1,410.98
1/11/18	Angelika Hakopian	Travel Reimbursement	1,391.69
1/23/18	Edwin Aiwazian	Travel Reimbursement	1,462.17
1/31/18	FedEx Express	Courier Service	50.95
1/31/18	Golden State Overnight	Courier Service	16.73
3/2/18	ProLegal	Attorney Service	99.95
4/11/18	Golden State Overnight	Courier Service	30.15
8/31/18	Golden State Overnight	Courier Service	175.23
4/19/19	Paul Hastings LLP	Mediation Fee	2,250.00
4/23/19	Arby Aiwazian	Travel Reimbursement	19.25
5/31/19	CourtCall, LLC	Attorney Service	94.00
Total:			12,498.41